



MAINSRING
CONSERVATION TRUST

January 30, 2019

Ms. Barbara Alfano, Brownfield Coordinator
Environmental Protection Agency, Region 4
Atlanta Federal Center, 61 Forsyth Street, SW 10th FL
Atlanta, GA 30303-8960

Dear Ms. Alfano:

Enclosed please find Mainspring Conservation Trust's application for a Brownfields Cleanup Grant for the former Simpson Gas and Oil site in Franklin, NC. In 2013, Mainspring Conservation Trust (Mainspring) began working on a project to develop a model collaboration aimed at cultural preservation, regional partnership, economic development and environmental conservation in western North Carolina by creating a Heritage Corridor which connects and conserves ancient Cherokee town sites within our service area. Recognizing the past achievements in partnering with the Eastern Band of Cherokee Indians (EBCI) to conserve other ancient and culturally-significant sites, Mainspring is now also focusing efforts on restoration of a blighted urban area surrounding Nikwasi Mound in modern-day Franklin, NC.

The greater project is a cooperative effort between Mainspring and the Nikwasi Initiative, a newly-formed nonprofit community development organization that is focused on developing this as the first major hub in the Nikwasi-Cherokee Cultural & Historic Corridor. The Nikwasi Initiative's goals are to preserve significant cultural and historic sites along the Little Tennessee River valley, to insure sensitive stewardship and interpretation of the sites, and to promote cultural tourism and economic development along the corridor. The Nikwasi Initiative board is composed of community members from Franklin, Macon County and the EBCI. Very few examples of truly collaborative initiatives between tribes and rural communities exist in the US. The Nikwasi Initiative is an historic opportunity for all our partners, including the Eastern Band of Cherokee Indians, EPA, the NC DEQ Brownfields Program, and neighboring municipalities and nonprofits, to create a national model of reconciliation and cooperative community-development efforts.

In collaboration with EBCI, the Cherokee Preservation Foundation, the Town of Franklin, Macon County, and other stakeholders, Mainspring has been taking steps toward creating a vision for restoration of the area encompassing old Nikwasi town. Since 2013 we have begun work toward site control of key properties, environmental assessment, cleanup, and redevelopment in a manner which honors the significance of Nikwasi Mound and the ancient townsite and promotes heritage tourism. On the heels of Mainspring's purchase and cleanup of our first brownfield site in 2016, it is imperative that Mainspring be able to also cleanup the Simpson Gas and Oil site to continue to redevelop these blighted and contaminated areas. Although Mainspring has invested over \$450,000 in capital in land purchases and the greater project has received substantial financial support for past planning, assessment, and cleanup of other parcels, we will not be able to move forward without EPA support for cleanup of the former Simpson Gas and Oil site.

Mainspring Conservation Trust appreciates consideration of this proposal. We appreciate EPA's support and partnership in the past, and look forward to continued work in the future. Should additional information be required, please feel free to contact Ben Laseter at 828-524-2711 x308 or at blaseter@mainspringconserves.org.

Thank you,



Ben Laseter, Deputy Director

Narrative Information Sheet

1) Applicant Identification:

Mainspring Conservation Trust, Inc., P.O. Box 1148, Franklin NC 28744

2) Funding Requested:

a) Grant Type: Single Site Cleanup

b) Federal Funds Requested: \$282,300, Cost share waiver requested.

c) Contamination: Petroleum

3) Location: Town of Franklin, Macon County, North Carolina

4) Property Information: Former Simpson Gas and Oil, 544 East Main Street, Franklin NC 28734

5) Contacts:

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|---|--|
| a) Project Director (grants.gov AOR): Ben Laseter, Deputy Director Mainspring Conservation Trust, Inc. P.O. Box 1148, Franklin NC 28744 (828) 524 - 2711 blaseter@mainspringconserves.org | b) Chief Executive: Sharon F. Taylor, Executive Director Mainspring Conservation Trust, Inc. P.O. Box 1148, Franklin NC 28744 (828) 524 - 2711 staylor@mainspringconserves.org |
|---|--|

6) Population: Town of Franklin - 3,845

7) Other Factors Checklist:

| Other Factors | Page # |
|---|--------|
| Community population is 10,000 or less. | 2 |
| The applicant is, or will assist, a federally recognized Indian tribe or United States territory. | 2 |
| The proposed brownfield site(s) is impacted by mine-scarred land. | |
| Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation. | |
| The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them). | |
| The proposed site(s) is in a federally designated flood plain. | 5 |
| The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects. | |

8) Letter from the State Environmental Authority: Attached.



ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL SCOTT
Director

October 26, 2017

Mr. Benjamin Laseter
Mainspring Conservation Trust, Inc.
P.O. Box 1148
Franklin, NC 28744

Re: U.S. EPA Brownfields Cleanup Grant – Mainspring Conservation Trust, Inc.

Dear Mr. Laseter,

The North Carolina Department of Environmental Quality (DEQ) Brownfields Program acknowledges and supports the Mainspring Conservation Trust, Inc. application for a U.S. EPA Brownfields Cleanup Grant. We are aware that your grant focuses specifically on the redevelopment of the former Simpson Gas and Oil property. This property is significant to the City of Franklin in that it is a prime area for recreational redevelopment and has access to a notable historical site, the Nikwasi Indian Mound. This grant would be monumental for economic development for the City.

We hope that Mainspring Conservation Trust is successfully awarded this grant, and we will continue to support you in your Brownfields redevelopment efforts. The Brownfields Program offers technical project guidance in accordance with our program, throughout the life of your project. This is a major key to ensuring grant applicants make efficient use of the federal funds awarded. The liability protection offered by the program is also a primary marketing tool for developers and instrumental in securing financing.

The Brownfields Program can also assist with outreach efforts to your local community regarding reuse for recreational purposes and the controls put in place to make the property suitable. The liability protection offered by a Brownfields Agreement is a benefit to the whole community and can often facilitate additional economic development.

We look forward to working with you regardless of a grant award or not. We truly believe successful Brownfields projects can rejuvenate a community.

Sincerely,

Bruce Nicholson
Brownfields Program Manager

cc: Cindy Nolan, U.S. EPA Region 4
David Loftis, S&ME

Narrative/Ranking Criteria for Cleanup Grants (100 pts.)

Mainspring – Simpson Gas & Oil site

IV.E.1 Project Area Description and Plans for Revitalization (30 pts.)

IV.E.1.a Target Area and Brownfields (8 pts.)

IV.E.1.a.i Background and Description of Target Area (3 pts.)

In the middle of the Nantahala National Forest in southwestern North Carolina is Franklin, a small town in the mountains that is a destination for Appalachian Trail hikers, gem miners, and retirees. Franklin is also steeped in history. Before Europeans arrived in North America, the land that is now Franklin was part of the vast territory of the Cherokee Indians. Following the Indian Removal Act of 1830, most of the Cherokees were forced to relocate to Oklahoma along the Trail of Tears. At least a quarter of the 16,000 Cherokees who began the march died of exposure, starvation or disease. Today, the Cherokees of Western North Carolina descend from those Cherokee who were able to hold onto the land they owned or who hid in the mountains, defying the orders for removal, as well as those who later returned, many on foot. The descendants of these people now live in the Qualla Boundary, just 30 miles from Franklin.

In the 1500's, Cherokee towns were found every few miles along the Little Tennessee River and its tributaries in the Great Smoky Mountains. Franklin was once an ancient and important Cherokee town called Nikwasi. The last visible remnant of this town is the Nikwasi Indian Mound in downtown Franklin. The Nikwasi Mound was the spiritual center of the area and it was believed that spirit people lived under the mound .. A Town House, used for councils, religious ceremonies, and general meetings, was located on top of the mound. The ever-burning sacred fire, which the Cherokee had kept burning since the beginning of their culture, was also located there. The mound is estimated to be well over 1,000 years old, but its true age is unknown because while many Native American mounds have been deconstructed for farming or development, the Nikwasi Mound has never been excavated.

This is due in part to the active involvement of the Franklin community. In 1946, the small parcel containing the mound was preserved from leveling and development through the efforts of Franklin schoolchildren. A teacher took a class to the mound for a history lesson, and the children noticed a "For Sale" sign on the property. This spurred them to do what they could to save the mound. Through a campaign of penny contributions, the children raised \$1,500, enough to purchase the property, which they then deeded to the Town of Franklin for the protection and preservation of the property. Many of these students are still residents of Franklin and they feel pride in their efforts. But today, the Nikwasi Mound's beauty is obscured by the abandoned and underused properties surrounding it. This relic of Cherokee history is the lone grassy parcel among a block of gas stations and parking lots where used cars and military equipment are sold. The only demarcation of the mound's significance is a small historical marker.

THE NIKWASI PROJECT

In October 2013, the Mainspring Conservation Trust (Mainspring) began working on a project to develop a model collaboration aimed at cultural preservation, regional partnership, economic development and environmental conservation around ancient Cherokee town sites within its service area. Recognizing the past achievements in partnering with the Eastern Band of

Cherokee Indians (EBCI) to conserve another mound and town site, as well as other lands in a rural area of north Macon County, Mainspring is now also focusing efforts on restoration of a blighted urban area surrounding Nikwasi Mound in modern-day Franklin, NC.

In 2013 Mainspring purchased a brownfield site adjacent to its main office in Franklin NC. By the summer of 2016, Mainspring had a final Brownfields Agreement with the NC Brownfields Program and had utilized approximately \$294,000 in EPA remediation funding via a regional COG's RLF.

In collaboration with EBCI, the Cherokee Preservation Foundation, the Town of Franklin, Macon County, and other stakeholders, Mainspring has been taking steps toward creating a vision for restoration of the area encompassing old Nikwasi town. Mainspring has identified three other brownfield parcels, surrounding Nikwasi Mound or nearby Little Tennessee Greenway parcels which, if secured, would form a nucleus for a future heritage area / greenspace complex. Mainspring is currently leading a collaborative effort to gain site control of these key properties, perform environmental assessment work, remediate contamination, protect future landowners from liability, and redevelop the area in a manner which honors the significance of Nikwasi Mound and the ancient townsite and promotes heritage tourism.

In addition to the area's cultural significance, the Nikwasi Project is also positioned at the only unfinished portion of the 4.5-mile Little Tennessee River Greenway, is located between two relatively vibrant activity centers of downtown Franklin, and adjacent to a popular public park, pavilion, and shelter on the Greenway. We believe the redevelopment of these key properties will kick-start the revitalization of the neighborhood, which serves as a gateway into downtown Franklin.

IV.E.1.a.ii Description of the Brownfield Site(s) (5 pts.)

The subject property, addressed 544 East Main Street, includes 0.67 acre and is located at the intersection of East Main Street and Big Bear Lane in the Town of Franklin, Macon County, North Carolina. The property is developed with a vacant single story structure formerly used as a fuel station. The vicinity of the subject property is mainly commercial properties with a greenway to the north.

The subject property historically has been developed as a fuel station since the 1950s, selling kerosene, fuel oil, gasoline, and diesel fuel. One fuel dispenser was located adjacent to the northeastern corner of the building on the subject property, two dispensers were located near East Main Street, and heating oil and kerosene was distributed via the overhead product lines connected to the former fueling rack on the southwestern portion of the building. Based on an interview between Mr. Bob Simpson, the immediate past property owner, and S&ME, four 30,000-gallon ASTs were located on the subject property. Based on a review of aerial photographs, the four 30,000-gallon ASTs were located on the subject property from the 1950s through 2005. According to the North Carolina Department of Environmental Quality (NCDEQ) Underground Storage Tank (UST) Registered Tank Database, one 2,000-gallon gasoline UST was installed on February 26, 1981 and one 550-gallon diesel UST was installed on February 26, 1984. The USTs were permanently closed by removal in April 1994. The property is currently vacant and no longer operated as a fuel station.

The subject property has been accepted into the North Carolina DEQ Brownfields Program. Mainspring Conservation Trust (Mainspring) was able to execute a contract with an option to purchase the subject property and has worked with NCDEQ to negotiate a Brownfields Agreement that allows the property to be redeveloped in a number of land uses, including greenspace, public park, retail commercial, light industrial.

In general accordance with S&ME Proposal No. 43-1600872 dated November 7, 2016, S&ME completed a Phase I Environmental Site Assessment (ESA) in association with the subject property. The February 2017 Phase I ESA revealed the following recognized environmental conditions in connection with the subject property:

- The subject property historically operated as a fuel station with ASTs and USTs. Petroleum contaminated soil and groundwater has been documented on the subject property.
- A heating oil UST was observed on the subject property, adjacent to and north of the northern most structure located on the southwestern adjoining property.
- The former fuel station operation on the southwestern adjoining property addressed 522 East Main Street.

Based on historical data and the limited soil assessment, it appears that a release of petroleum has occurred from the former USTs located on the northeastern side of the retail store, the existing product line, the former dispensers near East Main Street, and the existing heating oil UST. Near-surface soil contamination is currently present at concentration that exceed the NCDEQ IHS Unrestricted PSRGS in the vicinity of soil borings in multiple locations.

Based on the historical data and the recent limited groundwater assessment activities, a dissolved contaminant plume is likely present under the majority of the subject property and is likely migrating easterly towards Big Bear Lane.

IV.E.1.b Revitalization of the Target Area (12 pts.)

IV.E.1.b.i Redevelopment Strategy and Alignment with Revitalization Plans (7 pts.)

After contamination on the site is remediated, the site will be capped with clean backfill and will be ready for redevelopment. Although the NCDEQ Brownfields Agreement allows for a variety of future land uses, the redevelopment plan for the site consists of greenspace, with plantings, walkways, benches, and possibly sculpture. These features are part of a larger redevelopment plan which will tie the former Simpson Gas and Oil site into the adjacent Little Tennessee Greenway, Mainspring's office (including the remediated JH Duncan Oil brownfield site), Town of Franklin - owned Nikwasi Mound parcel, and Eastern Band of Cherokee Indian - owned parcel adjacent to the Mound.

Greenspace and public park development in this part of Franklin has been contemplated and desired for decades. Particularly since the Little Tennessee Greenway was established in the late 1990's, the blighted area between the Greenway and Nikwasi Mound has been the subject of much attention. Only in the past 5 years has it become possible to start to address these blighted parcels and to access resources to purchase, remediate, and redevelop the area around Nikwasi; this progress has only been possible through Mainspring's partnerships with the Town of Franklin, the Eastern Band of Cherokee Indians, NC DEQ Brownfields, and US EPA.

As part of the Main Street Program, Franklin commissioned a market study for downtown that was completed in January 2011. This study recommended that Franklin develop a downtown

community meeting space for family reunions, weddings, and small conferences. As part of the Downtown Park Redevelopment project, Franklin will incorporate this suggestion, furthering the goals of both the brownfields program and the Main Street Program. In addition, specialty retail is spread out across Franklin, and is not concentrated downtown. The comments collected as part of the market study said that more restaurants and a microbrewery would be desirable in Franklin's downtown. Creating a park adjacent to the riverfront greenway will make downtown a more attractive spot for entrepreneurs to establish restaurants, breweries, and stores.

IV.E.1.b.ii Outcomes and Benefits of Redevelopment Strategy (5 pts.)

Though qualified environmental professionals and geotechnical consultants are rare in rural western North Carolina, Mainspring has been successful in promoting the use of local sub-contractors in earth-moving, grading, hauling, surveying, and demolition in previous brownfields work. Mainspring is committed to the utilization of the local workforce and the benefit of the local economy wherever possible.

Based on the current draft of the Nikwasi Area Redevelopment Plan, the cleanup and redevelopment of the former Simpson Gas and Oil site will form a crucial link between current public/green-space and the ancient Nikwasi Mound. This creation of additional greenspace and improvement of a major gateway to downtown Franklin will result in substantial benefits to the overall Nikwasi Area and River District projects. The redevelopment of the Site will serve as a catalyst for additional investment in the project, which will result in increased pedestrian use of the Greenway, nearby shopping districts, and Franklin in general. Future users of the site and of the nearby Little Tennessee River will realize health benefits from reduced or eliminated contaminants from water, soil, and air in the area. These actions will result in significant benefits to welfare and environment as well as the removal of a very conspicuous blighted parcel on a major thoroughfare in downtown Franklin.

The project is expected to result in direct economic benefits of increased property values and tax revenue of nearby commercial properties. Indirect economic benefits will be realized in the form of increased tourism resulting from the development of the greater Nikwasi area as a major heritage tourism destination.

Community benefits associated with this project are tremendous. The Site is at the center of the 6-mile Little Tennessee Greenway, is within 200 feet of the Little Tennessee River, and will form a link between current public space and the ancient Nikwasi Mound.

IV.E.1.c Strategy for Leveraging Resources (10 pts.)

IV.E.1.c.i Resources Needed for Site Reuse (7 pts.)

There is significant investment available from Cherokee interests and other funders for redevelopment of the Nikwasi area. Cleanup of the Simpson parcel is key to demonstrating that the area is ready for next-phase design work which will be necessary to secure construction investment in the area.

IV.E.1.c.ii Use of Existing Infrastructure (3 pts.)

There is a new pedestrian facility on a recently-replaced bridge over the Little Tennessee River, which now connects the Greenway in a manner not previously possible. This key connection

will allow pedestrians to access the redeveloped parcel, which then allows connection to the Nikwasi Mound area.

IV.E.2 Community Need and Community Engagement (20 pts.)

IV.E.2.a Community Need (12 pts.)

IV.E.2.a.i The Community's Need for Funding (3 pts.)

Despite the appeal of living in and visiting Franklin, this mountain town still faces economic hurdles. Until the Great Depression, Franklin's economy was based on agriculture, mining and logging. Tourism became a part of Franklin's economy when landowners opened their property to casual gem exploration. Today, a series of special events help lure tourists. They include Pumpkinfest and the Scottish Heritage Festival. Unfortunately, once Franklin's economic base shifted from manufacturing to tourism, more jobs became seasonal. In fact, the unemployment rate doubles in winter when the population, conversely, shrinks by half. Because many own their second homes in Franklin, 56% of tax bills go out of the county. However, there are now signs that the downturn in the housing market is affecting the second-home industry.

According to the U.S. Census Bureau's 2005-2009 American Community Survey five-year estimates, 24.4% of families and 22.4% of individuals in Franklin lived below the poverty level, compared to 11.1% of families and 15.1% of individuals in North Carolina as a whole.³ Of Franklin families with a female householder and no husband present and with related children under 18 years old, 44% had incomes below the poverty level. Of children in Franklin, 29.6% lived below the poverty level, compared to 20.8% for North Carolina and 18.6% for the United States. The table below shows additional statistics for the Franklin residents.

IV.E.2.a.ii Threats to Sensitive Populations (9 pts.)

IV.E.2.a.ii.1 Health or Welfare of Sensitive Populations (3 pts.)

The former Simpson Gas and Oil property is a major contributor to the blighted appearance of Franklin's River District. The site is bordered by East Main Street and Northeast Main Street, the two major arteries bringing traffic to and from downtown Franklin's east side. At present, the property is vacant and is open to unchecked pedestrian and vehicular traffic. There is currently no barrier between the public and shallow petroleum contamination on the property. Although there is no evidence that petroleum contamination from the site is reaching the nearby Little Tennessee River, previous assessment work indicates that petroleum-related compounds (benzene and MTBE) are present in the soil and groundwater on the site. Furthermore, modeling suggests that these compounds are present in sufficient concentrations to be migrating up- and down-gradient and are leaving the site in concentrations that exceed applicable NC DEQ standards. Moreover, each of the brownfields that have been identified lie in the floodplain, meaning there is a chance they could be flooded.

IV.E.2.a.ii.2 Greater Than Normal Incidence of Disease and Adverse Health Conditions (3 pts.)

In addition to the environmental damage, residents of Macon County are vulnerable to health impacts from brownfields. The poorest of our population live in the vicinity of the abandoned gas stations and exposure to fuel oils can affect the nervous system, damage kidneys, and increase blood pressure (Agency for Toxic Substances & Disease Registry ToxFAQs for Fuel

Oils, www.atsdr.cdc.gov/toxfaqs). Retirees, a population particularly vulnerable to the health impacts of environmental contaminants, are common in Franklin. People over age 65 are 21.9% of Franklin's population. This is more than two-thirds higher than the State (12.9%) and national (13%) populations of people over 65. Because older populations are especially sensitive to the health effects of chemical releases, such as those associated with petroleum, the high percentage of the population over the age of 65 in Franklin indicates a cause for concern.

From 2005 to 2009, Macon County residents had higher death rates per 100,000 people than all North Carolinians for prostate cancer (10.3 versus 9.6). Age-adjusted death rates due to chronic liver disease were higher in Macon County than in North Carolina from 2005 to 2009 (13.1 versus 9.1). People with compromised immune systems, such as people who have undergone organ transplants or cancer treatments, are even more vulnerable to contaminants than the general population. Because of the high rates of prostate cancer and liver disease, residents of Franklin may be more likely than others to suffer the ill effects of contaminated water and soil. Some Macon County children start out life as part of a sensitive population. Women who smoke during pregnancy, which can cause birth defects, are more common in Macon County than statewide. Between 2005 and 2009, 11.0% of births statewide were to women who smoked prenatally; while in Macon County 18.2% of births were to mothers who smoked prenatally. 2 Combined with the risk for environmental pollutants due to brownfields, the high rate of children born to mothers who smoked prenatally indicates an especially sensitive population. Maintaining high environmental quality in the area could be a factor in improving child health.

IV.E.2.a.ii.3 Economically Impoverished/Disproportionately Impacted Populations (3 pts.)

The presence of abandoned gas stations is depressing property values in Franklin. Although parts of downtown have flourished with specialty shops, restaurants, and unique attractions like the Franklin Heritage Museum, the Scottish Tartans Museum, and the Franklin Gem and Mineral Museum, the areas near the brownfields have stagnated. Houses within a few blocks of the Nikwasi Mound, on the eastern side of the Town's small downtown area, are on the market for between \$69,000 and \$170,000, while on the other side of downtown, just one mile from the Nikwasi Mound, houses are on the market for \$250,000 to \$1.25 million. On the other side of the river, just a quarter of a mile from the Nikwasi Mound, riverfront properties sell for close to \$350,000. Clearly the presence of properties that have not been properly maintained is creating blight that has taken its toll on nearby property values and new investment in the community. The Town itself has limited ability to mobilize development of brownfields.

IV.E.2.b Community Engagement (8 pts.)

IV.E.2.b.i Community Involvement (5 pts.)

| List of Project Partners | | |
|--------------------------|---|--|
| Partner Name | Point of contact (name, email & phone) | Specific role in the project |
| Nikwasi Initiative | Juanita Wilson | Liaison with Cherokee community |
| Friends of the Greenway | Rita St. Clair | Major stakeholder in adjacent greenway |

| | | |
|--|----------------|---|
| Women's History Trail, a project of the Franklin Folk Heritage Association | Barbara McRae | Liaison with Franklin Folk Heritage Association |
| Eastern Band of Cherokee Indians Tribal Historic Preservation Office | Stephen Yerka | Representative re: archaeological resources |
| Museum of the Cherokee Indian | Barbara Duncan | POC with major Cherokee stakeholder |
| Cherokee Preservation Foundation | Daniel Martin | POC with major funder |
| Town of Franklin Planning Department | Justin Setser | Liaison with Town of Franklin |

Nikwasi Initiative was founded by Cherokee and non-Cherokee community members to spearhead the development of the Nikwasi-Cherokee Cultural Corridor. The Nikwasi Initiative's goals are to preserve significant cultural and historic sites along the Little Tennessee River valley, to insure sensitive stewardship and interpretation of the sites, and to promote cultural tourism and economic development along the corridor. Very few examples of truly collaborative initiatives between tribes and rural communities exist in the US. The Nikwasi Initiative is an historic opportunity for all our partners, including the Eastern Band of Cherokee Indians and neighboring municipalities and nonprofits, to create a national model of reconciliation and cooperative community-development efforts.

IV.E.2.b.ii Incorporating Community Input (3 pts.)

Through monthly stakeholder meetings now underway around the greater heritage corridor project, the Nikwasi Initiative is a key platform for keeping Cherokee and Franklin stakeholders apprised of project progress at Nikwasi (including the Simpson site). Mainspring enjoys a close relationship with our local press, and also has a dedicated communications coordinator who updates the public on a weekly basis re: Mainspring projects.

IV.E.3 Task Descriptions, Cost Estimates, and Measuring Progress (35 pts.)

IV.E.3.a Proposed Cleanup Plan (8 pts.)

Remediation of the Site will be consistent with the Analysis of Brownfields Cleanup Alternatives (ABCA) and consist of the excavation and proper disposal of petroleum-contaminated soils and asbestos containing materials on the Site. Remaining residual contaminated soil will be capped with clean fill per conditions outlined in the existing Brownfields Agreement for the site. This remediation option will utilize standard construction techniques and can be implemented in a relatively short timeframe.

During construction, engineering controls will be utilized including dust suppression during excavation activities and the use of temporary fencing to protect the public during construction activities. Once remediation is completed, institutional controls will be placed through the use of the Brownfields Agreement between Mainspring and the NCDEQ Brownfields Program. Deed restrictions will be implemented to prohibit the disturbance of the soil cover, the excavation of contaminated soil, and the extraction of groundwater from the Site.

IV.E.3.b Description of Tasks and Activities (12 pts.)

Tasks that will be conducted under the cleanup program:

Cooperative Agreement Oversight and Engineering: Includes costs for the planning, engineering, design, bidding, and oversight of cleanup activities; also includes programmatic management of the grant and attendance at the EPA National or Regional Brownfields Conference.

1. \$1,000 for programmatic management of the grant including quarterly reports, and ACRES updates (14 hours at \$70 per hour staff);
2. \$2,000 for attendance at the EPA Brownfields Conference;
3. \$5,000 for planning, engineering, design, and bidding (150 hours at \$100 per hour QEP);
4. \$5,000 for on-site oversight and documentation (150 hours at \$100 per hour QEP).

Public Meetings and Community Involvement: Includes development of a Community Relations Plan and finalizing the Analysis of Brownfields Cleanup Alternatives / Remedial Action Plan (ABCA/RAP), submittal of QAPP, and submitting an Environmental Management Plan. In addition, this task involves community involvement activities. This task includes \$5,000 for consultant time to finalize the ABCA/RAP and prepare the Community Relations Plan, QAPP and EMP documents, assist in the community outreach and public meetings (50 hours at \$100/hour);

Cleanup Activities: This task includes contracted costs for soil excavation and removal, capping of remaining contaminated soil at the Site, removal/disposal of asbestos containing material. This budget allocates all costs to contractual items to complete remediation activities at the Site and is further broken down to include approximately \$66,300 for the removal and disposal of contaminated soils, backfill/capping with clean soil, and removal/disposal of ACM. This task includes engineering oversight field reports, and bills of lading and/or waste manifests.

Site Stabilization & Reclamation: Includes \$148,000 contracted costs for removal of gravel surface on the site, with site preparation, replacement of soil layer, and establishment of a stable, vegetated surface.

Coordination & Reporting: Includes consultant costs for ongoing coordination with the EPA Brownfields Program and NCDEQ Brownfields Program. Subtasks will include communications, submission of status reports, and a remediation summary report. This task estimates \$10,000 for consultant time for preparing the remediation summary report (100 hours at \$100 per hour).

IV.E.3.c Cost Estimates and Outputs (10 pts.)

| Budget Categories | Project Tasks | | | | | |
|---------------------|--|---|--------------------|----------------------------------|--------------------------|-------|
| | Coop Agreement Oversight & Engineering | Public Meetings and Community Involvement | Cleanup Activities | Site Stabilization & Reclamation | Coordination & Reporting | Total |
| Personnel | | | | | | |
| Travel ¹ | 2,000 | | | | | 5,000 |

| | | | | | | |
|---|--------|--------|--------|---------|--------|---------|
| Equipment ² | | | | | | |
| Supplies | | | | | | |
| Contractual | 11,000 | 5,000 | 66,300 | 148,000 | 10,000 | 237,300 |
| Total Direct Costs ³ | 13,000 | 5,000 | 66,300 | 148,000 | 10,000 | 242,300 |
| Indirect Costs ³ | | | | | | 40,000 |
| Cost Share ⁴ | 5,000 | 5,000 | | 20,000 | 10,000 | 40,000 |
| Total Budget (Total Direct + Indirect + Cost Share) | 18,000 | 10,000 | 66,300 | 168,000 | 20,000 | 322,300 |

¹Travel to brownfields-related training conferences is an acceptable use of these grant funds.

²EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for Cleanup grants.

³Administrative costs (direct and/or indirect) cannot exceed 5% of the total EPA-requested funds.

⁴Applicants must include the cost share in the budget even if applying for a cost share waiver (see Section III.B.13 for a list of applicants that may request a cost share waiver). If the applicant is successful and the cost share waiver is approved, it will be removed in pre-award negotiation.

IV.E.3.d Measuring Environmental Results (5 pts.)

Sampling will occur during cleanup activities per NC DEQ Brownfields-approved Environmental Management Plan.

IV.E.4 Programmatic Capability and Past Performance (15 pts.)

IV.E.4.a Programmatic Capability (9 pts.)

IV.E.4.a.i Organizational Structure (5 pts.)

Mainspring has a staff of 12; three of these staff members will be available to administer, coordinate, and implement tasks included in this application. These staff members include project manager for the former Simpson Gas and Oil project (Ben Laseter -Deputy Director) and two administrative staff (Ramelle Smith - Finance Manager; Sharon Burdette - Administrative Assistant). Ben Laseter served as project manager for the 2016 JH Duncan Oil brownfield cleanup, which was funded by \$294,000 through Land-of-Sky Regional Council's EPA RLF. In addition to recent brownfields work, Mainspring administers \$400,000 to \$700,000 annually in federal, state, and foundation funds. Much of this funding is used to contract and sub-contract professional fees and labor involved in intensive stream restoration projects, land purchases/sales, and other capital-intensive work.

IV.E.4.a.ii Acquiring Additional Resources (4 pts.)

Mainspring has significant experience in acquiring both local and regional contractors for a variety of specialized projects including major stream restoration design and construction, recent brownfields remediation, and other tasks.

IV.E.4.b Past Performance and Accomplishments (6 pts.)

IV.E.4.b.i Currently Has or Previously Received an EPA Brownfields Grant (6 pts.)

IV.E.4.b.i.1 Accomplishments (3 pts.)

Not applicable.

IV.E.4.b.i.2 Compliance with Grant Requirements (3 pts.)

Not applicable.

IV.E.4.b.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (6 pts.)

IV.E.4.b.ii.1 Purpose and Accomplishments (3 pts.)

Mainspring has not been directly awarded EPA Brownfield funding in the past. Mainspring has been working with NCDEQ Brownfields for the past 3 years on Brownfield projects in the Nikwasi area. This partnership has resulted in two successful Brownfield Agreements and brownfield site purchases. Per conditions of the existing Brownfield Agreement for the former Simpson Gas and Oil site, Mainspring will coordinate with NC DEQ throughout the cleanup and redevelopment of the Site.

As a result of Mainspring's successful efforts to enroll the Simpson Gas and Oil site into the NC Brownfields Program, and to put in place a Brownfields Agreement and associated Land Use Restrictions, Mainspring will follow terms of the Brownfield Agreement and associated Land Use Restrictions in the cleanup of the site. The Brownfields Agreement also requires that Mainspring develop and follow an EPA- and NCDEQ-approved Environmental Management Plan as we clean up the site. As evidenced by NCDEQ Brownfields' letter of support included in this application, the NC Brownfields Program will provide technical assistance with the cleanup. Mainspring also plans to hire a qualified, experienced environmental consulting firm to oversee and coordinate the cleanup activities and will ensure that we comply with appropriate competitive procurement provisions to ensure that this technical expertise is in place prior to beginning cleanup activities.

IV.E.4.b.ii.2 Compliance with Grant Requirements (3 pts.)

Mainspring was the recipient of EPA RLF funds via a subgrant from Land-of-Sky Regional Council (Asheville, NC) in 2016. A total of \$294,000 in RLF funding was used to cleanup a brownfield site very similar to the former Simpson Gas and Oil site. Mainspring successfully expended those funds to complete remediation of the site, and successfully reported all necessary data to the grantor.

Mainspring received a contract for \$161,000 from USDA NRCS and \$75,000 from USDI US Fish & Wildlife service in 2017. Both of these awards funded a 2,000-foot stream restoration on Savannah Creek in Jackson County, NC. The construction phase of the project was successfully completed in 2017.

Mainspring is currently administering over 3.5 million dollars in USDA NRCS RCPP funding to secure farmland easements for two projects in western North Carolina.

IV.E.4.b.iii Never Received Any Type of Federal or Non-Federal Assistance Agreements (3 pts.)

Not applicable.

III.B. Threshold Criteria for Cleanup Grants

Mainspring – Simpson Gas & Oil site

III.B.1 Applicant Eligibility

Mainspring Conservation Trust, Inc. (EIN 56-2142199) was recognized as exempt under section 501(c)(3) of the Internal Revenue Code in a determination letter issued by the IRS in February 2016 (see attached). As a nonprofit organization, Mainspring's mission is to conserve the waters, forests, farms, and heritage of the Upper Little Tennessee and Hiwassee River Valleys in western North Carolina and northern Georgia.

III.B.2 Previously Awarded Cleanup Grants

The proposed site has not received funding from a previously-awarded EPA Brownfields Cleanup Grant.

III.B.3 Site Ownership

Mainspring Conservation Trust, Inc. (Mainspring) owns the former Simpson Gas and Oil site. The property was acquired from Simpson Gas and Oil, Inc. via fee simple title through a deed recorded on November 13, 2017.

III.B.4 Basic Site Information

- (a) Name of Site: Former Simpson Gas and Oil Site
- (b) Address: 544 East Main Street, Franklin, NC 28734
- (c) Owner: Mainspring Conservation Trust, Inc.

III.B.5 Status and History of Contamination at the Site

- (a) The site is contaminated by petroleum.
- (b) The subject property was operated as a fuel station since the 1950's, selling kerosene, fuel oil, gasoline, and diesel fuel. Four 30,000-gallon AST's were located on the property from the 1950's through 2005. Smaller UST's were located on the property during the 1980's through 1990's. The site was operated as Simpson Oil and Simpson Gas & Oil, Inc. until the company was administratively dissolved in 2010 and was suspended by NC Dept. of Revenue in 2015. Between 2010 and 2015, the property was used as a small gun shop. The property was used during the Summer/Fall of 2016 as the Macon County Democratic Headquarters. Since that time, the service station building has been vacant and the property only used for temporary parking of vehicles.
- (c) Environmental concerns are petroleum contamination to soil and groundwater. This contamination may impact future users of the property and could impact downgradient ground- and surface-waters such as the nearby Little Tennessee River.
- (d) Based on historical data and more recent soil and groundwater assessments conducted from 2015-2017, it appears that a release of petroleum has occurred from former above- and under-ground storage tanks, product lines, and dispensers on the site. Soil assessment results indicate that soil contamination (VOC's and SVOC's) is currently present at concentrations that exceed the NCDEQ IHS Unrestricted PSRGS. Groundwater assessment results indicate that a dissolved contaminant plume is likely present under the majority of the Simpson Gas and Oil

property. The distribution of dissolved contaminants suggests the contaminant plume has likely migrated via advective forces to the east-northeast in the direction of groundwater flow.

III.B.6 Brownfields Site Definition

The Simpson Gas and Oil site is: a) not listed or proposed for listing on the National Priorities List; (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) not subject to the jurisdiction, custody, or control of the United States government.

III.B.7 Environmental Assessment Required for Cleanup Proposals

The following environmental assessments have been conducted at the Simpson Gas and Oil site: Limited Soil and Groundwater Assessment Report, Former Simpson Gas and Oil Property 544 East Main Street, Franklin, Macon County, North Carolina S&ME Project No. 4341-17-002, May 9, 2017;

Asbestos and Lead-Based Paint Report, Former Simpson Gas and Oil Property 544 East Main Street, Franklin, Macon County, North Carolina S&ME Project No. 4341-17-002, April 24, 2017;

Phase I Environmental Site Assessment (ESA), Former Simpson Gas and Oil Property 544 East Main Street, Franklin, Macon County, North Carolina S&ME Project No. 4341-17-002, February 17, 2017;

Report of Environmental Services Former J.H. Duncan Oil, Inc. and Simpson Gas and Oil, Inc. Franklin, Macon County, North Carolina S&ME Project No. 4305-15-154, September 4, 2015; Underground Storage Tank Closure Report for Simpson Oil Company, Alpha Environmental Science, Inc., March 1999;

Comprehensive Site Assessment (CSA) for the Release of Petroleum Product at the Simpson Oil Company Facility, Alpha Environmental Science, Inc., January 26, 1999.

III.B.8 Enforcement or Other Actions

Does Not Apply.

III.B.9 Sites Requiring a Property-Specific Determination

There are no known environmental enforcement or other actions related to the former Simpson Gas and Oil site.

Mainspring has requested a Petroleum Determination from NC Department of Environmental Quality and expects to receive that documentation soon (email correspondence attached).

III.B.10 Threshold Criteria Related to CERCLA/Petroleum Liability

III.B.10.a Property Ownership Eligibility - Hazardous Substance Sites

III.B.10.a.i Exemptions to CERCLA Liability

III.B.10.a.i.1 Indian Tribes

Does Not Apply.

III.B.10.a.i.2 Alaska Native Village Corporations and Alaska Native Regional Corporations

Does Not Apply.

III.B.10.a.i.3 Property Acquired Under Certain Circumstances by Units of State and Local Government

Does Not Apply.

III.B.10.a.iii Landowner Liability Protections from CERCLA Liability

III.B.10.a.iii.1 Bona Fide Prospective Purchaser Liability Protection

III.B.10.a.iii.1.a Information on the Property Acquisition

Does Not Apply.

III.B.10.a.iii.1.b Pre-Purchase Inquiry

Does Not Apply.

III.B.10.a.iii.1.c Timing and/or Contribution Toward Hazardous Substances Disposal

Does Not Apply.

III.B.10.a.iii.1.d Post-Acquisition Uses

Does Not Apply.

III.B.10.a.iii.1.e Continuing Obligations

Does Not Apply.

III.B.10.a.ii. Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability

III.B.10.a.ii.1 Publicly Owned Brownfield Sites Acquired Prior to January 11,2002

Does Not Apply.

III.B.10.b Property Ownership Eligibility - Petroleum Sites

III.B.10.b.i Information Required for a Petroleum Site Eligibility Determination

III.B.10.b.i.1 Current and Immediate Past Owners

The current owner of the site is Mainspring Conservation Trust, Inc. The preceding owner was Simpson Gas and Oil, Inc.

III.B.10.b.i.3 No Responsible Party for the Site

Mainspring Conservation Trust, Inc. (i.) **did not** dispense or dispose of petroleum or petroleum product contamination, or exacerbate the existing petroleum contamination at the site; (ii.) **did not** own the site when any dispensing or disposal of petroleum (by others) took place; and (iii.) **did** take reasonable steps with regard to the contamination at the site.

The immediate past owner, Simpson Gas & Oil Inc.(i.) **did** dispense or dispose of petroleum or petroleum product contamination, or exacerbate the existing petroleum contamination at the site; (ii.) **did** own the site when any dispensing or disposal of petroleum (by others) took place; and (iii.) it is undetermined whether or not Simpson Gas and Oil took reasonable steps with regard to the contamination at the site.

III.B.10.b.i.2 Acquisition of Site

Mainspring Conservation Trust acquired the property on November 13, 2017 via fee simple purchase.

III.B.10.b.i.4 Cleaned Up by a Person Not Potentially Liable

Mainspring **did not** dispense or dispose of petroleum or petroleum product, or exacerbate the existing petroleum contamination at the site. Mainspring **did** take reasonable steps with regard to contamination of the site by commissioning additional assessment, negotiation of land use restrictions with NC DEQ necessary to enroll the property in the NC Brownfields Program.

III.B.10.b.i.5 Judgments, Orders, or Third Party Suits

The following **do not apply** to the site:

- i. a judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the site; or
- ii. an enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or clean up the site; or
- iii. a citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the site.

III.B.10.b.i.6 Subject to RCRA

The site is **not** subject to any order under section 9003(h) of the Solid Waste Disposal Act.

III.B.10.b.i.7 Financial Viability of Responsible Parties

The immediate past owner, Simpson Gas and Oil Inc. is out of business and is no longer operating. It is Mainspring Conservation Trust's understanding that Simpson Gas and Oil does not have the financial capability to satisfy their obligations under federal or state law to assess, investigate, or clean up the site. The only known asset of the company is the contaminated property which is the subject of this application. The site was operated as Simpson Oil and Simpson Gas & Oil, Inc. until the company was administratively dissolved in 2010 and was suspended by NC Dept. of Revenue in 2015. Simpson Gas and Oil, Inc. is currently in bankruptcy.

III.B.11 Cleanup Authority and Oversight Structure

III.B.11.a Cleanup Oversight

As a result of Mainspring's successful efforts to enroll the Simpson Gas and Oil site into the NC Brownfields Program, and to put in place a Brownfields Agreement and associated Land Use Restrictions, Mainspring will follow terms of the Brownfield Agreement and associated Land Use Restrictions in the cleanup of the site. The Brownfields Agreement also requires that Mainspring develop and follow an EPA- and NCDEQ-approved Environmental Management Plan as we clean up the site. As evidenced by NCDEQ Brownfields' letter of support included in this application, the NC Brownfields Program will provide technical assistance with the cleanup. Mainspring also plans to hire a qualified, experienced environmental consulting firm to oversee and coordinate the cleanup activities and will ensure that we comply with appropriate competitive procurement provisions to ensure that this technical expertise is in place prior to beginning cleanup activities.

III.B.11.b Access to Adjacent Properties

Access to adjacent or neighboring properties is not anticipated for site cleanup. If access becomes necessary, however Mainspring has very good working relationships with all property owners adjacent to the site.

III.B.12 Community Notification

III.B.12.a Draft Analysis of Brownfields Cleanup Alternatives

Attached.

III.B.12.b Community Notification Ad

A public notice was published in The Franklin Press newspaper on January 16, 2019 (see attached). A public meeting was held on January 30, 2019.

III.B.12.c Public Meeting

A public meeting was conducted on January 30, 2019 from 3-5pm at the offices of Mainspring Conservation Trust, Inc. In addition to Ben Laseter, Mainspring's Deputy Director and Project Manager for the subject proposal, five other people attended the meeting. These five people are listed below, with notes on any comments/questions and Mainspring's responses:

Stacy Guffey - Mr. Guffey is a resident of Macon County and a local business owner in downtown Franklin. He expressed support for Mainspring's work in purchase and redevelopment of Simpson Gas & Oil, Mainspring's second brownfield project in the River Gateway District.

Bill VanHorn was interested in the cleanup plan for the subject property. He was also interested in the greater vision for greenspace and redevelopment around the Nikwasi area.

Ryan Hanchett is an employee of the local newspaper, and expressed support for the project.

Connie Rehling is a retiree and Macon County resident. She expressed appreciation for Mainspring's brownfields work in this blighted part of Franklin.

Barbara McRae is a local historian and Franklin resident. She expressed support for the project and noted how redevelopment of the site would complement her recent efforts in establishment of a women's history trail in Franklin.

A sign-in sheet for the meeting is attached.

III.B.12.d Submission of Community Notification Documents

Please see attached.

III.B.13 Statutory Cost Share

III.B.13.a Meet Required Cost Share

Mainspring is submitting a hardship waiver of the cost share.

III.B.13.b Hardship Waiver

A hardship waiver of the cost share is requested. See attached.



Department of the Treasury
Internal Revenue Service

P.O. Box 2508
Cincinnati OH 45201

In reply refer to: 0248205661
Feb. 16, 2016 LTR 4168C 0
56-2142199 000000 00

00017536
BODC: TE

MAINSRING CONSERVATION TRUST INC
PO BOX 1148
FRANKLIN NC 28744



038038

Employer ID Number: 56-2142199
Form 990 required: Yes

Dear Taxpayer:

This is in response to your request dated Feb. 04, 2016, regarding your tax-exempt status.

We issued you a determination letter in August 1999, recognizing you as tax-exempt under Internal Revenue Code (IRC) Section 501(c)(3).

Our records also indicate you're not a private foundation as defined under IRC Section 509(a) because you're described in IRC Sections 509(a)(1) and 170(b)(1)(A)(vi).

Donors can deduct contributions they make to you as provided in IRC Section 170. You're also qualified to receive tax deductible bequests, legacies, devises, transfers, or gifts under IRC Sections 2055, 2106, and 2522.

In the heading of this letter, we indicated whether you must file an annual information return. If a return is required, you must file Form 990, 990-EZ, 990-N, or 990-PF by the 15th day of the fifth month after the end of your annual accounting period. IRC Section 6033(j) provides that, if you don't file a required annual information return or notice for three consecutive years, your exempt status will be automatically revoked on the filing due date of the third required return or notice.

For tax forms, instructions, and publications, visit www.irs.gov or call 1-800-TAX-FORM (1-800-829-3676).

If you have questions, call 1-877-829-5500 between 8 a.m. and 5 p.m., local time, Monday through Friday (Alaska and Hawaii follow Pacific Time).

0248205661
Feb. 16, 2016 LTR 4168C 0
56-2142199 000000 00
00017537

MAINSRING CONSERVATION TRUST INC
PO BOX 1148
FRANKLIN NC 28744

Sincerely yours,



Doris Kenwright, Operation Mgr.
Accounts Management Operations 1



Ben Laseter <blaseter@mainspringconserves.org>

Petroleum Determination Request - former Simpson Gas and Oil brownfield site

LaFond, Caroline <caroline.lafond@ncdenr.gov>

Tue, Jan 29, 2019 at 11:32 AM

To: Ben Laseter <blaseter@mainspringconserves.org>

Cc: "Nicholson, Bruce" <bruce.nicholson@ncdenr.gov>, "Wahl, Tracy" <tracy.wahl@ncdenr.gov>, "Thompson, Jordan L" <jordan.thompson@ncdenr.gov>, "Jackson, Vance" <vance.jackson@ncdenr.gov>

Hi All,

The last correspondence I had with EPA was last January. We had a rough draft drawn up and Vance Jackson and I were discussing the determination.

Since then the FY19 guidance has been modified. I will review this information and hopefully get something to you by the end of the week.

My apologies for allowing this to fall off my radar.

Thanks

Caroline



Caroline LaFond
Regional Supervisor, DWM, UST Section, Asheville Regional Office
North Carolina Department of Environmental Quality
828.296.4500 (Main Office)
caroline.lafond@ncdenr.gov

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

From: Ben Laseter <blaseter@mainspringconserves.org>**Sent:** Saturday, January 26, 2019 2:47 PM**To:** LaFond, Caroline <caroline.lafond@ncdenr.gov>**Cc:** Nicholson, Bruce <bruce.nicholson@ncdenr.gov>; Wahl, Tracy <tracy.wahl@ncdenr.gov>; Thompson, Jordan L <jordan.thompson@ncdenr.gov>**Subject:** [External] Fwd: Petroleum Determination Request - former Simpson Gas and Oil brownfield site

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to report.spam@nc.gov

Ms. LaFond,

I am in the process of completing a USEPA Cleanup Grant proposal and have realized that I do not have a Petroleum Determination Letter on file. The last correspondence I can locate is included below. Can you help me with this?

Many thanks,

Ben

Ben Laseter, PhD

Deputy Director

828-524-2711 x 308

www.mainspringconserves.org

----- Forwarded message -----

From: **Ben Laseter** <blaseter@mainspringconserves.org>

Date: Tue, Dec 19, 2017 at 3:19 PM

Subject: Petroleum Determination Request - former Simpson Gas and Oil brownfield site

To: <caroline.lafond@ncdenr.gov>

Cc: Thompson, Jordan L <jordan.thompson@ncdenr.gov>, Wahl, Tracy <tracy.wahl@ncdenr.gov>, Nicholson, Bruce <bruce.nicholson@ncdenr.gov>, <jawaid.bushra@epa.gov>, Warren, Camilla <Warren.Camilla@epa.gov>

Ms. LaFond,

Please see the attached (attachment 1 of 3) letter requesting a petroleum determination letter for the former Simpson Gas and Oil property located in Franklin NC. US EPA has asked that Mainspring (as grant applicant) request this letter from DEQ as supporting documentation to a Cleanup Grant proposal now being reviewed by EPA staff.

The former Simpson Gas and Oil property is now owned by Mainspring (a conservation non-profit serving the western-most 6 counties in NC. This is our second brownfields project in coordination with the NC Brownfields program. I have also included supporting documentation which may help provide background and context for the project. Please do not hesitate to contact me with any questions.

Thanks in advance for your help in this,

Ben

Ben Laseter, PhD

Associate Director



828-524-2711 x 308

1/30/2019

Mainspring Conservation Trust, Inc Mail - Petroleum Determination Request - former Simpson Gas and Oil brownfield site

www.mainspringconserves.org

ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

Former Simpson Gas and Oil, Inc. Property

544 East Main Street Franklin, Macon
County North Carolina

March 18, 2015

January 15, 2019



MAINSRING
CONSERVATION TRUST

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1.0 Introduction and Background

1.1 Site Location

The subject property, addressed 544 East Main Street, includes 0.67 acre and is located at the intersection of East Main Street and Big Bear Lane in the Town of Franklin, Macon County, North Carolina. The property is developed with a vacant single story structure formerly used as a fuel station. The vicinity of the subject property is mainly commercial properties with a greenway to the north.

1.2 Previous Use

The subject property historically has been developed as a fuel station since the 1950s, selling kerosene, fuel oil, gasoline, and diesel fuel. One fuel dispenser was located adjacent to the northeastern corner of the building on the subject property, two dispensers were located near East Main Street, and heating oil and kerosene was distributed via the overhead product lines connected to the former fueling rack on the southwestern portion of the building. Based on an interview between Mr. Bob Simpson, the immediate past property owner, and S&ME, four 30,000-gallon ASTs were located on the subject property. Based on a review of aerial photographs, the four 30,000-gallon ASTs were located on the subject property from the 1950s through 2005. According to the North Carolina Department of Environmental Quality (NCDEQ) Underground Storage Tank (UST) Registered Tank Database, one 2,000-gallon gasoline UST was installed on February 26, 1981 and one 550-gallon diesel UST was installed on February 26, 1984. The USTs were permanently closed by removal in April 1994. The property is currently vacant and no longer operated as a fuel station.

The subject property has been accepted into the North Carolina DEQ Brownfields Program. Mainspring Conservation Trust (Mainspring) was able to execute a contract with an option to purchase the subject property and has worked with NCDEQ to negotiate a Brownfields Agreement that allows the property to be redeveloped in a number of land uses, including greenspace, public park, retail commercial, light industrial.

1.3 Past Site Assessments

Previous assessment activities are summarized in the following sections:

1.3.1 Comprehensive Site Assessment (1999)

In response to a Notice of Violation issued by NCDEQ in October 1998, Alpha Environmental Science, Inc. (Alpha) was contracted by Mr. Doug Simpson (father of Mr. Bob Simpson), the property owner and former operator of Simpson Gas and Oil, to complete a Comprehensive Site Assessment (CSA) for the subject property. The CSA activities included the collection of 11 groundwater samples from the shallow, unconfined aquifer, three soil samples adjacent to the former AST area, and two soil samples at the approximate depth of the former UST tank excavation. Based on a review of the analytical results presented on Figure 2 of the 1999 Alpha CSA, groundwater contamination was detected in the vicinity of the ASTs, dispensers, and in the vicinity of the eastern property boundary. Soil contamination was detected in the samples collected near the ASTs and former USTs. It should be noted that a groundwater sample was not collected near the former USTs.

1.3.2 UST Closure Testing (1999)

According the NCDEQ UST Registered Tank Database and the UST-2 forms found in Appendix B of the Underground Storage Tank Closure Report written by Alpha and dated March 1999, the 2,000-gallon and 550-gallon USTs located on the Simpson Oil property were permanently closed in April 1994. To provide proper UST closure sampling, Alpha collected two soil samples from beneath the former UST tank basin in November 1998 and two in February 1999. Alpha summarized the analytical results by stating, "Based on the

analytical results reported, it appears that a release of petroleum has occurred from the USTs". It is documented in the UST-2 form of the March 1999 Alpha report that the 2,000-gallon UST was converted to an AST and the 550-gallon UST was transferred to a farmers possession to be used as an AST.

1.3.3 Sewer Line Installation (2010)

Petroleum-impacted soil was encountered during installation of sewer line on the west side of the subject property adjacent to NE Main Street. Approximately, 30 to 45 tons of petroleum-impacted soil was excavated and transported off-site for disposal during installation of the sewer line.

1.3.4 Soil and Groundwater Assessment (2015)

S&ME performed soil and groundwater assessment activities on the subject property in July 2015 for the NCDEQ Inactive Hazardous Site Branch (IHS). At the time of the 2015 assessment activities, the Land Trust for the Little Tennessee (now known as Mainspring Conservation Trust) was in the process of obtaining a contract with an option to purchase the subject property with tentative plans to redevelop the subject property as green space under a BFA. The North Carolina Brownfields Program received a grant from the United States Environmental Protection Agency (USEPA) to be used for assessment activities to move the subject property along in the BFA process. The NCDEQ IHS was tasked with contracting the assessment activities for completion.

In July 2015, S&ME installed eight temporary monitoring wells and collected groundwater samples for analyses of volatile organic compounds (VOCs) by Method 8260LL (low level) and semi-volatile organic compounds (SVOCs) by EPA Method 8270D. Target analytes were detected in two of the groundwater samples at concentrations that exceed the respective NCDEQ UST Gross Contamination Levels (GCLs). Target analytes were detected in the groundwater samples collected from monitoring wells TMW-1 through TMW-8 at concentrations that exceed the respective North Carolina Groundwater Quality Standards (15A NCAC 2L .0202), herein identified as the 2L Standards. Target analytes were detected in seven of the groundwater samples at concentration that exceeded the respective NCDEQ Division of Waste Management (DWM) Vapor Intrusion Non-Residential Groundwater Screening Levels (GWSLs).

S&ME completed 20 soil borings ranging in depths from 10 to 20 feet below ground surface (ft-bgs) and collected soil samples ranging in depths from 4 to 10 ft-bgs for analyses of VOCs by 8260B and SVOCs by EPA Method 8270D. Target analytes were detected at concentrations in two of the soil samples that exceeded the respective Industrial Preliminary Soil Remediation Goals (PSRGs), in three of the soil samples that exceeded the respective Residential PSRGs¹, and eight of the soil samples that exceeded the respective Protection of Groundwater PSRGs. Based on the groundwater elevation figure, the groundwater flows east towards the Little Tennessee River. During the assessment, groundwater was encountered approximately 9 to 14 ft-bgs. The findings of the assessment activities were provided in the Report of Environmental Services dated September 4, 2015. The report concluded that it appears that a release of petroleum has occurred either from the former aboveground storage tanks (ASTs) or underground (USTs) located on the eastern side of the retail store.

1.3.4 Brownfields Assessment

In general accordance with S&ME Proposal No. 43-1600872 dated November 7, 2016, S&ME completed a Phase I Environmental Site Assessment (ESA) in association with the subject property. The February 2017 Phase I ESA revealed the following recognized environmental conditions in connection with the subject property:

- The subject property historically operated as a fuel station with ASTs and USTs. Petroleum contaminated soil and groundwater has been documented on the subject property.
- A heating oil UST was observed on the subject property, adjacent to and north of the northern most structure located on the southwestern adjoining property.
- The former fuel station operation on the southwestern adjoining property addressed 522 East Main Street.

1.3.5 Asbestos and Lead-Based Paint Assessment

An asbestos and lead-based paint assessment was conducted on the former Simpson Gas & Oil Property located at 544 East Main Street in Franklin, Macon County, North Carolina on April 13, 2017. The reports, dated April 24, 2017 concluded that asbestos-containing materials (ACMs) were identified in floor tile located beneath carpet in the building. Lead-based paint was not identified on the interior or exterior surfaces of the building.

1.4 Project Goal

The redevelopment of the Property proposed herein will provide the following public benefits:

- Elimination of a source of contamination near the Little Tennessee River which is both designated as Critical Habitat for three federally listed aquatic species and a popular recreational use area;
- A return to productive use of the Property for the community;
- Potential to stimulate revitalization of this area by complementing existing adjacent public property and improving the appearance of the area, potentially creating a “River Gateway” district of Franklin;
- Potential additional retail, commercial, light industrial and/or office space for the area and associated jobs;
- Potential for increased tax revenue for affected jurisdictions;
- Potential space for historic and cultural interpretation around the story of the ancient Nikwasi Mound less than 200 feet west of the Property; and
- Potential for public park, and/or greenspace in the only gap in the 4.5 mile Little Tennessee Greenway.

2.0 Applicable Regulations

2.1 Oversight Responsibility

This project is being performed under the NCDEQ Brownfields Program with regulatory oversight by the Brownfields Program Project Manager, Ms. Jordan Thompson.

2.2 Cleanup Standards

Soil assessment results are compared to the standards established by NCDEQ Inactive Hazardous Sites Branch (IHSB) Residential Preliminary Soil Remedial Goals (RPSRGs) and Industrial Preliminary Soil Remedial Goals (IPSRGs). Groundwater results are evaluated against the NCAC Title 15A Subchapter 2L Classification and Water Quality Standards Applicable to the Groundwaters of North Carolina.

2.3 Applicable Laws and Regulations

Assessment and remediation strategies associated with this site are and will be conducted in compliance with the Brownfields Program as administered through NCDEQ and in compliance with applicable portions of the USEPA Brownfields Program.

3.0 Evaluation of Cleanup Alternatives

Site cleanup will include one or more of the following alternatives. Before any cleanup of environmental media the fuel station building will be demolished and properly disposed of in accordance with applicable regulations.

3.1 Alternatives Considered - Soil

3.1.1 Phytoremediation is the use of vegetation for *in situ* degradation of contaminants in soil, sediments and groundwater. Specialized plants can be used to absorb, filter, convert or stabilize contaminants like petroleum hydrocarbons. This technology is especially useful where contaminants of low to moderate concentrations are at or near the ground surface.

3.1.2 SVE is an *in situ* treatment process that is applicable given the physical site conditions and contaminants to be remediated. By moving a relatively high volume of air through the unsaturated zone and venting vapors through shallow wells, liquid phase and sorbed contaminants are converted to their vapor phases. The contaminants are physically stripped from the environmental media, volatilized and discharged to the atmosphere or adsorbed to activated carbon media. Introduction of oxygen to the subgrade can enhance bioactivity to consume petroleum hydrocarbons *in situ*.

3.1.3 Excavation and disposal is a cost effective method for remediating petroleum impacted soil. Surface soils with elevated concentrations of volatile and semi-volatile compounds can be removed to a limited depth of 1.5 to 2 feet and backfilled with clean soil. Limited deeper excavation may occur as necessary to reduce excessive concentrations of contaminants that may serve as a secondary source of groundwater contamination. The clean soil backfill will act as a permanent cap to isolate remaining contaminants from site users.

3.1.4 "No remedial action" on the impacted soil is not an option for this site because of the potential for direct contact with soil by users of the property. Soil concentrations exceed the RPSRGs. Active remediation of at least some of the impacted soil may be mandated by NCDEQ Brownfields Program.

3.2 Alternatives Considered - Groundwater

Due to the lack of sensitive receptors in the immediate vicinity of the contaminant plume and since no free product has been detected on the site, groundwater remediation is not recommended. No groundwater remediation alternatives were considered for this reason.

3.3 Effectiveness and Implementability

3.3.1 Soil Remediation Options

3.3.1.1 Phytoremediation - In the case of the Simpson Gas and Oil Facility, the physical site conditions and contaminant concentrations may be conducive to the use of this remedial option. Phytoremediation allows for cleanup of contaminants in place with minimal disturbance of the subgrade. However, the use of this alternative may not allow for isolation of the treatment area from site users. The process is slow and ongoing monitoring for effectiveness would be necessary. It could be used on smaller, less accessible portions of the site. This treatment option is readily implementable.

3.3.1.2 SVE - Favorable site soil conditions such as high porosity, low clay content, and lack of

impervious zones that impede air flow may be present at this site. The limited volume of impacted soil minimizes treatment time. SVE systems are typically used in conjunction with air sparging systems when both soil and groundwater have been impacted. While this may be an effective option, the implementability of this option is cumbersome and time consuming due to pilot testing, system design, system installation, and operations and maintenance. This is the least cost effective option. Additionally, use of portions of the property would be restricted until remediation goals have been achieved and the system is decommissioned.

3.3.1.3 Excavation and removal is the preferred remedial option for this site. Excavation activities can be monitored for effectiveness in a timely manner. The intended use of the property can be realized quickly, and the costs are less than active on-site treatment. Contaminated soil is transferred to another site for land farming; however, the land farm uses techniques to enhance biodegradation of the contaminants in the soil resulting in a sustainable and environmentally responsible treatment alternative. This option can be readily implemented using low-tech processes that achieve good results. Ongoing monitoring is not required after confirmation that the desired results have been reached.

3.4 Estimated Costs:

3.4.1 Alternative 1 – Phytoremediation: The cost of Alternative 1 is estimated to be between \$70,000 and \$105,000.

3.4.2 Alternative 2 – Soil Vapor Extraction (includes air sparge system): The cost of Alternative 2 is estimated to be between \$420,000 and \$630,000.

3.4.3 Alternative 3 – Excavate and Dispose: The cost of Alternative 3 is estimated to be between \$120,000 and \$180,000.

3.4.4 Alternative 4 – No Action: There would be no cost associated with Alternative 4.

4.0 Changing Climate Considerations

USEPA discusses the general expected impact in the southeast as a result of climate change on their website. The region's climate is generally warm and wet, with mild and humid winters. Since 1970, average annual temperatures in the region have increased by about 2°F. Winters, in particular, are getting warmer. The average number of freezing days has declined by four to seven days per year since the mid-1970s. Most areas, with the exception of southern Florida, are getting wetter. Autumn precipitation has increased by 30% since 1901. The number of heavy downpours has increased in many parts of the region. Despite increases in fall precipitation, the area affected by moderate and severe drought, especially in the spring and summer, has increased since the mid-1970s.

Average annual temperatures in the region are projected to increase by 4 to 9°F by 2080. Hurricane-related rainfall is projected to continue to increase. It is unclear how precipitation will change in the rest of the region. Climate models are currently inconclusive as to whether the net change will be an increase or decrease. Models do suggest that rainfall will arrive in heavier downpours with increased dry periods between storms. These changes would increase the risk of both flooding and drought.

The Simpson Gas and Oil site is located within the 100-year flood zone of the Little Tennessee River, along a

dam-controlled reach of the river. It is expected that the site may be inundated with flood waters at times. Periodic flooding may increase the incidence of surface soil erosion. Clean soil backfill placed over moderately petroleum impacted soil to act as a barrier to prevent direct exposure to humans may be compromised as a result. Routine inspection of the fill areas and repair as necessary will mitigate this concern.

It is expected that lowered base flow within the river associated with extended drought periods may also affect both the groundwater table elevations and the hydraulic gradient at the site. Generally, because groundwater is shallow at the site and occurs in alluvium, the response of the groundwater to changing water levels in the river might be expected to be fairly rapid. If the river base flow is lowered, groundwater levels will respond quickly which will also temporarily steepen the gradient. The groundwater gradient will quickly equilibrate, offsetting the otherwise temporary expected increase in the hydraulic gradient. Likewise, if river levels increase, the groundwater elevation would be expected to increase as well, bringing the water table closer to the ground surface. It is possible that these expected changes in climate and resulting fluctuations of the aquifer over time could aid the natural attenuation processes resulting in biodegradation of the petroleum contaminants at the site by increasing contact of impacted groundwater with organic matter and increasing oxygen exposure. The naturally occurring oxygen and organic matter content of the soil and groundwater at this site will make natural attenuation of the petroleum constituents an effective remedial alternative.

5.0 Recommendation

In evaluating the remedial alternatives for this site, the primary factors considered included timeliness, effectiveness, public health, and cost. The intended use for this site includes public access as a part of the Greenway already in place along the Little Tennessee River. As discussed above, removal of contaminated surface soil with permanent capping of remaining contaminated soil is a cost effective and timely alternative that is protective of human health and the environment.

Invoice / Affidavit
The Franklin Press
Post Office Box 350
Franklin, NC 28744

STATE OF NORTH CAROLINA
COUNTY OF MACON

AFFIDAVIT OF PUBLICATION Personally appeared before the undersigned, Dorothy Halpin, who having been duly sworn on oath that she is the Administrative Assistant of The Franklin Press, and the following legal advertisement was published in The Franklin Press newspaper, and entered as second class mail in the Town of Franklin in said county and state; and that she is authorized to make this affidavit and sworn statement; that the notice or other legal advertisement, a true copy of which is attached hereto, was published in The Franklin Press newspaper on the following dates:

SIMPSON GAS PUBLIC NOTICE

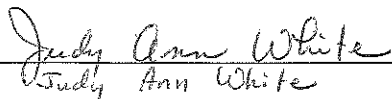
01/16/2019

And that the said newspaper in which such notice, paper, document or legal advertisement was published, was at the time of each and every such publication, a newspaper meeting all the requirements and qualifications of Section I-597 of the General Statutes of North Carolina and was a qualified newspaper within the meaning of the Section I-597 of the General Statutes of North Carolina.



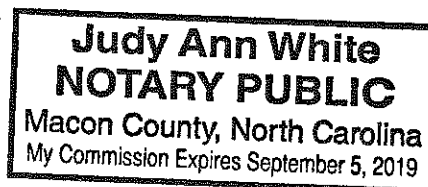
Signature of person making affidavit

Sworn to and subscribed before me this 16th day of January, 2019



Notary Public

My Commission Expires: September 5, 2019



Filed with: MAINSPRING CONSERVATION TRUST
Address: PO BOX 1148 FRANKLIN NC 28744
Total Amount Due: \$121.50

... lunch. Visit
or call 828-227-
er.

annual MLK Jr.
will take place
until 2 p.m.
Jan. 21 on the WCU
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the Community
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828-421-0550.
Franklin Amateur

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• The Jackson County NAACP, which serves Macon County, will meet at 10 a.m. **Saturday, Jan. 19** at Liberty Baptist Church in Sylva.

• The Holly Springs Community Development Club will meet at 6 p.m. **Monday, Jan. 21** at the community building located at 2720 Cat Creek Road in Franklin. There will be breakfast and a guest speaker.

Arts & Entertainment

• A new comedy starring Diane Keaton, Jane Fonda, Candice Bergen and Mary Steenburgen will be shown at 2 p.m. **Wednesday, Jan. 16** in the program room at the Macon County Public Library on Siler Farm Road. Four longtime friends have their lives upended when they aim to spice up their mundane routines by reading the provocative bestseller "Fifty Shades of Grey." Rated PG-13 for sex-related material throughout, and language; 1 hr. 44 min.

Someone mentioned a swimming pool at the community building. Why not go a little further and try to bring in a YMCA, which would serve the entire community and be open regular hours?

It's a shame that Congress won't cooperate with the president and end the shutdown.

Does having a radio in your car inhibit drivers in Macon County from using their turn signals?

Good fences make good neighbors. Apparently Democrats don't understand that saying.

ful thing about the four roundabouts being built in Franklin, is the millions of tax dollars being wasted on an unneeded project.

Teachers in California are on strike due to massive class sizes. The reason for much of that problem, especially in southern California, is illegal immigrant children.

Thank you to Macon Transit for always providing affordable, on-time service.



the church left the building?



Sunday Services
8:30 & 10:55 am
66 Harrison Ave
(828) 524-3010

firstumcfFranklin.org

NOTICE OF INTENT TO APPLY FOR US EPA BROWNFIELDS CLEANUP GRANT

Site Name: Simpson Gas and Oil

Mainspring Conservation Trust, Inc., intends to apply for a Cleanup Grant from the US Environmental Protection Agency. The Brownfields Property, which is the former site of Simpson Oil and Gas, consists of 0.67 acre and is located at 544 E Main Street, Franklin, Macon County, North Carolina. Environmental contamination exists on the Brownfields Property in soil and groundwater.

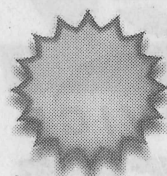
The draft proposal, including a draft Analysis of Brownfield Cleanup Alternatives (ABCA) may be reviewed at the Macon County Public Library, 149 Siler Farm Road, Franklin, NC 28734 by contacting the Assistant County Librarian Mr. Keith Barnett at (828) 524-3600 and at kbarnett@fontanalib.org; or by contacting Ben Laseter at Mainspring Conservation Trust at blaseter@mainspringconserves.org, (828) 524-2711 x308.

Written comments may be sent to:
blaseter@mainspringconserves.org, or

Ben Laseter
Mainspring Conservation Trust
P.O. Box 1148
Franklin, NC 28744

A public meeting will also be held on Wednesday, January 30 from 3:00pm to 5:00pm at the offices of Mainspring Conservation Trust, 557 East Main Street, Franklin, NC 28734. The purpose of this meeting will be to discuss the draft proposal with interested community members, answer questions, and receive comments on the proposal.

FRANKLIN AREA 4-DAY FORECAST



WEDNESDAY

Sunny

Precip.chance 0%

high 55°
low 28°

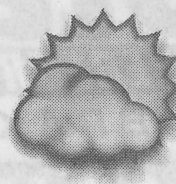


THURSDAY

Showers

Precip.chance 70%

high 49°
low 41°



FRIDAY

AM Clouds/PM Sun

Precip.chance 20%

high 58°
low 34°



SATURDAY

Showers

Precip.chance 80%

high 55°
low 46°

BLUE?
service.



THE CORBIN AGENCY
KIM CORBIN
(828) 524-7799

MOON PHASES

TODAY

[Public Meeting - Mainspring / Simpson Gas & Oil EPA Brownfield Cleanup Grant Proposal] sign-in sheet

Location: [Mainspring Conservation Trust office, 557 East Main St., Franklin NC 28734]

Date: [January 30, 2019]

Time: [3:00 - 5:00pm]

| | Name | Email | Mailing Address |
|----|-----------------|---------------------------------|--|
| 1 | Stacy J. Guffey | stacyjguffey@yahoo.com | 148 Watanga Church Rd., Franklin, NC 28734 |
| 2 | BILL VAN HORN | airborneengineer20bde@gmail.com | 45 Pine Hill Road, Franklin NC 28734 |
| 3 | RYAN HANCOCK | news@thefranklinpress.com | 291 N. Womack St. Franklin NC 28734 |
| 4 | Connie Rehling | | 418 Janes Lane, Franklin, N.C. 28734 |
| 5 | Barbara McRae | mcbarbara@frontier.com | 266 Harrison Ave, Franklin 28734 |
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Hardship Waiver Request

Mainspring – Simpson Gas & Oil site

Mainspring is respectfully requesting a Hardship Waiver of the cost share, based on the fact that we are a 501c3 nonprofit entity, with no guaranteed source of income. We rely heavily on private donations to fund staff salaries and overhead, and rely heavily on foundation, state, and federal grant funding to support programmatic work. While we have been able to leverage other funding in the past which would have supported the 20% cost share required of this grant, we have not been able to identify funding sources available during the life of the subject grant.

Although Mainspring has invested over \$450,000 in capital in land purchases and the greater project has received substantial financial support for past planning, assessment, and cleanup of other parcels, we will not be able to move forward without EPA support for cleanup of the former Simpson Gas and Oil site.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

01/30/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

North Carolina

8. APPLICANT INFORMATION:

* a. Legal Name: Mainspring Conservation Trust, Inc.

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

0451806630000

d. Address:

* Street1:

PO Box 1148

Street2:

* City:

Franklin

County/Parish:

Macon

* State:

NC: North Carolina

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

28744-1148

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Benjamin

Middle Name:

* Last Name:

Laseter

Suffix:

Title: Deputy Director

Organizational Affiliation:

* Telephone Number:

8285242711

Fax Number:

8285244741

* Email: blaseter@mainspringconserves.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-07

* Title:

FY19 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Mainspring Conservation Trust's proposal for cleanup of former Simpson Gas and Oil site in Franklin, NC via USEPA FY2019 Cleanup Grant.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

| | |
|---------------------|---|
| * a. Federal | <input type="text" value="282,300.00"/> |
| * b. Applicant | <input type="text" value="0.00"/> |
| * c. State | <input type="text" value="0.00"/> |
| * d. Local | <input type="text" value="0.00"/> |
| * e. Other | <input type="text" value="0.00"/> |
| * f. Program Income | <input type="text" value="0.00"/> |
| * g. TOTAL | <input type="text" value="282,300.00"/> |

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: